

## Exhibit 1

Documents fabricated by Ostella by copying signature of Taitz from a document created on March 15, 2009 and copied to drafts of documents from January 19, 2009

Case 8:11-cv-00485-AG-AJW Document 753-1 Filed 11/03/17 Page 2 of 58 Page ID  
#6058

SUBP-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Orly Taitz, Esq. 223433 Orly Taitz, Esq. 26302 La Paz, STE 211 Mission Viejo, CA 92691 TELEPHONE NO: 949-683-5411 FAX NO. (Optional): 949-586-8110 E-MAIL ADDRESS (Optional): dr_taitz@yahoo.com ATTORNEY FOR (Name):		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 720 Ninth Street MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95815 BRANCH NAME:		
PLAINTIFF/PETITIONER: Amb. Dr. Alan Keyes, Wiley S. Drake and Markham Robinson DEFENDANT/RESPONDENT: Bowen, Obama, Biden et al		
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>		CASE NUMBER: 34-2008-80000096-CU-WM-GDS

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

Robert S. Mueller, III Director - US Immigrations and Customs Enforcement  
 500 12<sup>th</sup> St. SW, Washington, DC 20535-0001

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): Orly Taitz, Esq.  
 On (date): 02/20/2009 At (time): 10:00AM  
 Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691

Do not release the requested records to the deposition officer prior to the date and time stated above.

- ☒ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
  - ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
  - ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:  
 Per Executive Order from January 16, 2009, any and all documents relating to "fitness and determination" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agency in regards to Barack Hussein Obama.  
☒ Continued on Attachment 3.
4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: January 19, 2009

Dr. Orly Taitz, Esq.  
 (TYPE OR PRINT NAME)

(Proof of service on reverse)

Form Adopted for Mandatory Use  
 Judicial Council of California

DEPOSITION SUBPOENA FOR PRODUCTION  
 OF BUSINESS RECORDS

Revised May 6, 2004  
 WWW.LMCA.ORG  
 Law Publishers

Code of Civil Procedure  
 §§ 9020.410-9020.440  
 Title 9.5 - Discovery

Exhibit "D"

pg. 55

AER 1465

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number, and address): Orly Taitz, Esq. 223433 Orly Taitz, Esq. 26302 La Paz, STE 211 Mission Viejo, CA 92691 TELEPHONE NO.: FAX NO. (Home): 949-586-8110 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): dr_taitz@yahoo.com		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 720 Ninth Street MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95815 BRANCH NAME:		
PLAINTIFF/PETITIONER: Ambassador Dr. Alan Keyes; Wiley S. Drake and Markham Robinson DEFENDANT/RESPONDENT: Obama, Obama, Biden et al		
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS		CASE NUMBER:

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (Name, address, and telephone number of deponent, if known):

US Attorney, 219 S. Dearborn St. 5<sup>th</sup> Floor Honorable Patrick Fitzgerald  
 Chicago, IL 60604

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:

To (name of deposition officer): Orly Taitz, Esq. On (date): 02/20/09 Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691	At (time): 10:00am
--	--------------------

Do not release the requested records to the deposition officer prior to the date and time stated above.

- ☒ by delivering a true, legible, and durable copy of the business records described in Item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in Item 1.
  - ☐ by delivering a true, legible, and durable copy of the business records described in Item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
  - ☐ by making the original business records described in Item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in Item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:  
 Per Executive Order from January 16, 2009, any and all documents relating to "fitness and determination" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agency.  
☒ Continued on Attachment 3.
4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1868.3 OR 1868.8 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: January 19, 2009

Dr. Orly Taitz, Esq.  
 (TYPE OR PRINT NAME)

(Proof of service on return)

Form Adopted for Mandatory Use  
 Judicial Council of California

DEPOSITION SUBPOENA FOR PRODUCTION  
 OF BUSINESS RECORDS

Modified by S. 2004  
 (Law Revision)

Code of Civil Procedure  
 §§ 1868.3, 1868.8, 1868.9, 1869

Exhibit "D"



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Orly Taitz, Esq. 223433 Orly Taitz, Esq. 26302 La Paz, STE 211 Mission Viejo, CA 92691 TELEPHONE NO.: FAX NO. (Optional): 949-586-8110 E-MAIL ADDRESS (Optional): ATTORNEY FOR PAGES dr_taitz@yahoo.com		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF <b>Sacramento</b> STREET ADDRESS: 720 Ninth Street MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95815 BRANCH NAME:		
PLAINTIFF/PETITIONER: Ambassador Dr. Alan Keyes; Wiley S. Drake and Markham Robinson DEFENDANT/RESPONDENT: Bowen, Obama, Biden et al		
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS		CASE NUMBER:

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

US Attorney, 219 S. Dearborn St. 5<sup>th</sup> Floor  
 Chicago, IL 60604

YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:

To (name of deposition officer): Orly Taitz, Esq.  
 On (date): 02/20/09 At (time): 10:00am  
 Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691

Do not release the requested records to the deposition officer prior to the date and time stated above.

- ☒ by delivering a true, legible, and durable copy of the business records described in Item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in Item 1.
  - ☐ by delivering a true, legible, and durable copy of the business records described in Item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1583(b).
  - ☐ by making the original business records described in Item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in Item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 18 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1583(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:  
 Per Executive Order from January 6, 2009, any and all documents relating to "Stance and determination" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agency.  
☒ Continued on Attachment 3.
4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1986.3 OR 1986.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: January 19, 2009

Dr. Orly Taitz, Esq.  
 (TYPE OR PRINT NAME)

(Print of service on response)

(TITLE)

Seal Adopted by Mandatory Law  
 Judicial Council of California

DEPOSITION SUBPOENA FOR PRODUCTION  
 AS WRITTEN HEREIN

Seal for 3 and  
 Law Enforcement

Code of Civil Procedure  
 20 P.P.C. 11

Exhibit "D"

pg. 58

AER 1468

SUBP-010

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  Orly Taitz, Esq. 223433  Orly Taitz, Esq.  26302 La Paz, STE 211 Mission Viejo, CA 92691  TELEPHONE NO.: 949-683-5411 FAX NO. (Optional): 949-586-8110  EMAIL ADDRESS (Optional): dr_taitz@yahoo.com  ATTORNEY FOR (Name):</p>	<p>FOR COURT USE ONLY</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento  STREET ADDRESS: 720 Ninth Street  MAILING ADDRESS:  CITY AND ZIP CODE: Sacramento, CA 95815  BRANCH NAME:</p>	
<p>PLAINTIFF/PETITIONER: Amb. Dr. Alan Keyes, Wiley S. Drake and Markham Robinson  DEFENDANT/RESPONDENT: Bowen, Obama, Biden et al</p>	
<p><b>DEPOSITION SUBPOENA  FOR PRODUCTION OF BUSINESS RECORDS</b></p>	<p>CASE NUMBER:  34-2008-80000096-CU-WM-GDS</p>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

Mike Hayden - Central Intelligence Agency  
Office of Public Affairs, Washington, DC 20505

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

<p>To (name of deposition officer): Orly Taitz, Esq.  On (date): 02/20/2009  Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691</p>	<p>At (time): 10:00AM</p>
---	---------------------------

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☒ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
  - b. ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
  - c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1551.
3. The records to be produced are described as follows:  
Per Executive Order from January 16, 2009, any and all documents relating to "fitness and determination" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agency in regards to Barack Hussein Obama.  
☒ Continued on Attachment 3.
4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1986.3 OR 1986.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: January 19, 2009

Dr. Orly Taitz, Esq.  
(TYPE OR PRINT NAME)



(Proof of service on reverse)

(TITLE)

Form Adopted for Mandatory Use  
Judicial Council of California

**DEPOSITION SUBPOENA FOR PRODUCTION  
OF BUSINESS RECORDS**

Revised form 4/2005  
WWW.LAWCALS.COM  
Law Publishers

Code of Civil Procedure,  
§§ 2020.410-2020.440,  
Revised 4/2005

Exhibit "D"

pg. 59

AER 1469







AER 1471



#18465

#6059

1/28/2009 23:44 7328462875

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
 Orly Taitz, Esq. 223433  
 Orly Taitz, Esq.  
 26302 La Paz, STE 211 Mission Viejo, CA 92691  
 TELEPHONE NO.: 949-683-5411 FAX NO. (Optional): 949-586-8110  
 E-MAIL ADDRESS (Optional): dr\_taitz@yahoo.com  
 ATTORNEY FOR (Name):

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento  
 STREET ADDRESS: 720 Ninth Street  
 MAILING ADDRESS:  
 CITY AND ZIP CODE: Sacramento, CA 95815  
 BRANCH NAME:

PLAINTIFF/PETITIONER: Amb. Dr. Alan Keyes, Wiley S. Drake and Markham Robinson  
 DEFENDANT/RESPONDENT: Bowen, Obama, Biden et al

DEPOSITION SUBPOENA  
 FOR PRODUCTION OF BUSINESS RECORDS

CASE NUMBER:  
 34-2008-80000096-CU-WM-GDS

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

Central Intelligence Agency  
 Office of Public Affairs, Washington, DC 20505

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3. as follows:

To (name of deposition officer): Orly Taitz, Esq.

At (time): 1:00AM

On (date): 02/20/2009

Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691

Do not release the requested records to the deposition officer prior to the date and time stated above.

- ☒ by delivering a true, legible, and durable copy of the business records described in Item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena, clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to deposition officer at the address in item 1.
  - ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs separating the copy, as determined under Evidence Code section 1583(b).
  - ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of separating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1561. The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:  
 Per Executive Order from January 16, 2009, any and all documents relating to "fitness" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agent to Barack Hussein Obama.  
☒ Continued on Attachment 3.
4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.8 AND A MOTION TO DISMISS OR OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WRIT OR EMPLOYEE RECORDS, AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT OF COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES REASONABLY INCURRED BY YOU IN YOUR FAILURE TO OBEY.

Date issued: January 19, 2009

Dr. Orly Taitz, Esq.  
 (TYPE OR PRINT NAME)

Form Adopted for Mandatory Use  
 Judicial Council of California

(Proof of service on respondent)  
 DEPOSITION SUBPOENA FOR  
 PRODUCTION OF BUSINESS RECORDS

(TITLE)  
 (Printed name of person  
 who served this subpoena)  
 Law Permissions

Costs of Civil Procedure  
 §§ 2032.410-2032.440;  
 Civil Procedure § 101.1(a)(1)

Exhibit "D"

pg. 56

AER 1466



Attorney General, Eric H

page 4 of 4

Such negligence and misprision threaten to nullify these essential safeguards. Thus Relators request this Quo Warranto be related to the Supreme Court under its original jurisdiction.

Enclosed is a summary motion for leave to file Quo Warranto on Barack Hussein Obama II aka Barry Sotero, with the Supreme Court. The list of Questions Presented is attached. A full brief supporting this motion is in preparation.

- 1) Relators respectfully pray that the Attorney General recuse himself over bringing this Quo Warranto for the United States on Barack H. Obama II, by reason of intrinsic conflict of interest.
- 2) Relators pray the Attorney General appoint a Special Assistant (prosecutor) of Archibald Cox's reputation and expertise, to relate this Quo Warranto to the Supreme Court per 28 USC 543.
- 3) Relators request that their attorney, Orly Taitz, ESQ DDS, assist in relating this Quo Warranto, being recognized at bar before the Supreme Court.
- 4) Relators further request the assistance of Patrick Fitzgerald, United States Attorney General for the Northern District of Illinois, as having familiarity with issues involving Barack Obama while Senator from Illinois and as President Elect.
- 5) Relators request guidance from the Attorney General, within one week of receipt of this information, regarding his decision on whether to appoint such a Special Assistant.

With respect, in absence of such guidance, Relators will proceed to request leave to file this Quo Warranto with the Supreme Court to relate information for this Quo Warranto on Mr. Obama to test his title.

Yours Sincerely,



Orly Taitz, ESQ  
Attorney for Relators  
26302 La Paz  
Mission Viejo, CA 92691  
949-683 5411

Encl. Motion to Supreme Court for leave to file this Quo Warranto on Mr. Obama to test his title to the Federal office of President.

PS Form 3811, February 2004 Domestic Return Receipt

PS Form 3811, February 2004 Domestic Return Receipt

On January 11, 2002, I was appointed Special Assistant for the United States to relate Quo Warranto on Barack Hussein Obama to the President before the Supreme Court.

... Lt. Scott Easterling, currently serving in Iraq; Major James Cannon, US Marine  
 ... New Hampshire State Representative Mr. Timothy Comerford; Tennessee State  
 ... Mr. Frank Nicol, State of Alabama 2008 electoral college elector Mr. Robert Cusanelli  
 ... Warranto on Barack Hussein Obama, II, testing his title to President per  
 ...



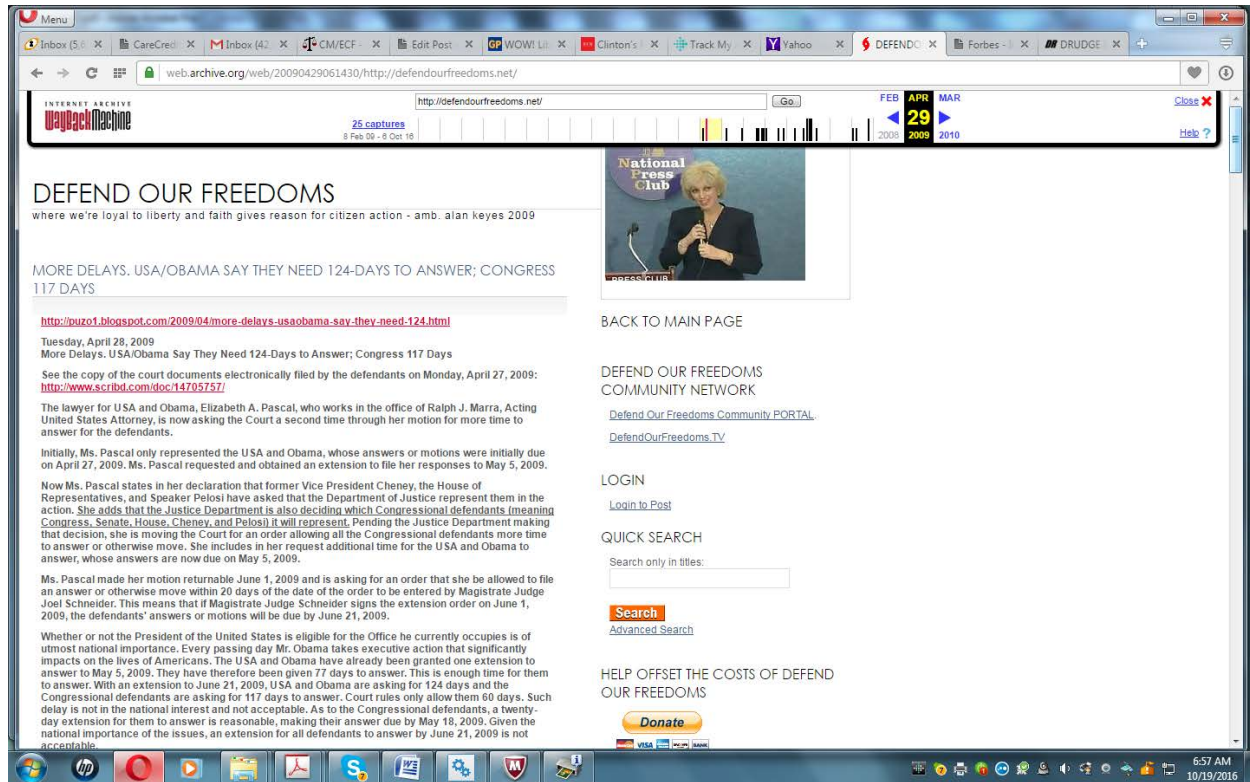
**Exhibit 2**

**Evidence from Internet Archive -Wayback Machine**

**Ostella is using the picture of Orly Taitz, President of Defend Our Freedoms Foundation and the name of the foundation after her taking over the website and soliciting donations that go to her own pocket.**

**Sign says:"Help offset the cost of Defend Our Freedoms"**

**PayPal Donate button underneath**





**Exhibit 3**

**Unauthorized Mother's Day letter promoting Berg sent by Ostella**

**Without consent of Taitz and DOFF Ostella used the website and e-mails for DOFF to promote opposing attorney Philip Berg**

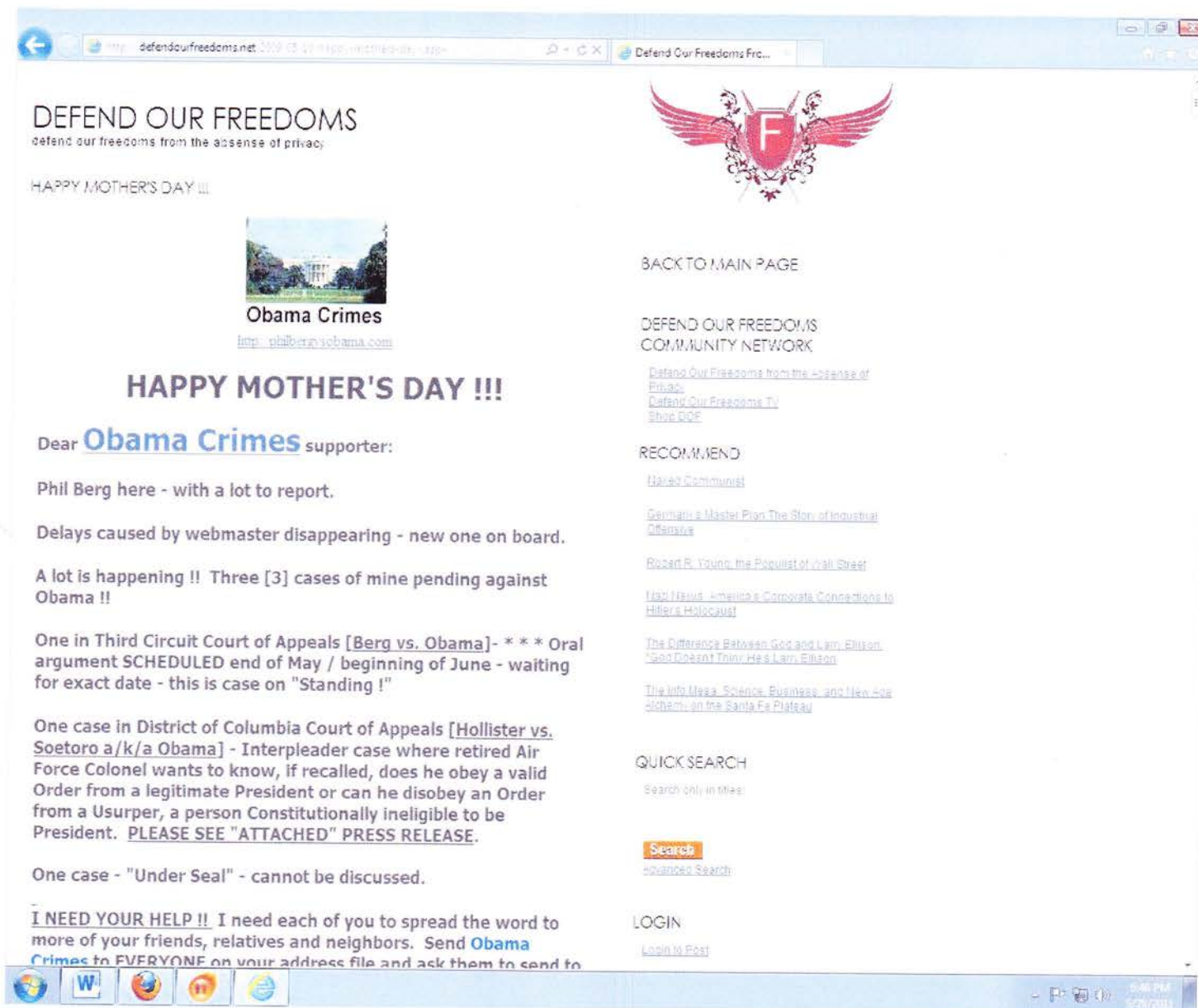


Exhibit "A"

Pg. 11



## **EXHIBIT 4**

**BOGUS LINKEDIN ACCOUNT DEFAMING TAITZ, CLAIMING  
TAITZ HAS ONLY MASTER IN LAW, NOT JD, WHICH MAKES HER  
INELIGIBLE TO PRACTICE LAW AND THAT SHE HAS A PHD IN  
DENTISTRY, NOT DDS, WHICH MAKES HER INELIGIBLE TO  
PRACTICE DENTISTRY**



## Dr. Orly Taitz

Dr. Orly Taitz at Dr. Orly Taitz

Orange County, California Area

| Legal Services

[Current](#)

[Previous](#)

[Education](#)

Orly Taitz Attorney

Dr. Orly Taitz

Taft Law School

0connections

Join LinkedIn & access Dr. Orly's full profile. It's free!

As a LinkedIn member, you'll join 300 million other professionals who are sharing connections, ideas, and opportunities.

- See who you know in common
- Get introduced
- Contact Dr. Orly directly

[View Dr. Orly's Full Profile](#)

### Background

#### Summary

Dr. Orly Taitz is an American dentist, lawyer, former real estate agent, and leading figure in the "birther" movement, which challenges whether Barack Obama is a natural-born citizen eligible to serve as President of the United States. Dr. Orly Taitz also promotes a number of other allegations both related and unrelated to Obama, and has initiated a number of lawsuits on behalf of the "birther" movement.

Dr. Orly Taitz was born to a Jewish family in Chişinău, Moldavian SSR in the Soviet Union (present day Moldova). Both of her parents were science teachers. In 1981, Dr. Orly Taitz immigrated to Israel, where she obtained a dentistry degree at Hebrew University. In 1987, Dr. Orly Taitz met Yosef Taitz who proposed four months later. Orly immigrated to the United States in May 1987, marrying the Latvian-born Yosef in Las Vegas, Nevada. Dr. Orly Taitz became a naturalized United States citizen in 1992. Dr. Orly Taitz received her law degree from Taft Law School and was admitted to practice law in California in December 2002.

Dr. Orly Taitz lives in Laguna Niguel, California and owns dental practices in nearby Mission Viejo and Rancho Santa Margarita. Dr. Orly Taitz has three sons, holds a second degree black belt in Taekwondo, and speaks five languages; English, Hebrew, Romanian, Russian and Spanish.

Before her national news exposure, Dr. Orly Taitz was quoted in The Orange County Register in 2006 supporting Israeli military actions against Hamas and Hezbollah, and downplaying the impact of the espionage trial of two American Israel Public Affairs Committee staffers (charges against both were subsequently dropped). Dr. Orly Taitz has also said that she lost relatives in the Holocaust and that her grandmother witnessed the Kishinev pogrom.

Specialties: dentist, lawyer, former real estate agent

#### Experience

##### Lawyer

Orly Taitz Attorney

January 2002 – Present (13 years 1 month)

##### Dentist

Dr. Orly Taitz

January 1981 – January 1992 (11 years 1 month) Israel

Dr. Orly Taitz

#### Skills

- Dentistry
- Law
- Dr. Orly Taitz

## Education

### Taft Law School

Masters, Law

1996 – 2002

### Hebrew University

Ph.D in Dentistry, Dentistry

1979 – 1987



## **EXHIBIT 5**

### **DECLARATION OF BRUCE WILTSE**

October 23, 2016

To Whom It May Concern:

For about the last eight years I have been following the actions of Dr. Orly Taitz on her Internet web page titled Defend Our Freedom Foundation (DOFF). During this time I was normally able to find her Web Page on the Internet and then the address for the DOFF changed. I would not have known about this change if it had not been for a call from Dr. Taitz providing me with the new address.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bruce M. Wiltse". The signature is fluid and cursive, with a prominent loop at the end.

Bruce M. Wiltse

374 Country Club Ln

Napa, CA 94558

## **EXHIBIT 6**

### **DECLARATION OF JEFF LICHTER**



DECLARATION OF JEFF LICHTER

1. I, Jeff Lichter, am over 18 years old and have personal knowledge of the foregoing.
2. I have been a supporter of Orly Taitz from 2008. I followed her legal actions relating to the Constitutional law and public interest.
3. From around 2009 I have been receiving e-mails from Shirley Waddell, mother of Lisa Liberi.
4. In her e-mails Waddell fabricated defamatory statements about Orly Taitz.
5. Waddell made defamatory statements accusing Orly Taitz of stalking Waddell's daughter, Lisa Liberi, even though Waddell did not provide any specific evidence of stalking.
6. Waddell defamed Taitz alleging that Taitz asked her associates to lie in court.
7. Waddell made defamatory statements accusing Taitz of not being truthful.
8. Waddell tried to misrepresent Liberi's criminal record, which was exposed by Taitz, alleging that Taitz publishes filth.
9. Waddell defamed Taitz and her husband and accused Taitz and her husband of illegal spying on people.
10. Waddell defamed Taitz by accusing Taitz of committing crimes.
11. Waddell defamed Taitz and accused Taitz of posting "video filth" on line on the web site for DOFF and suggested that Taitz possibly tapped into the computer of Waddell to receive Waddell's e-mails.
12. Waddell wrongfully claimed that Taitz tried to become a partner with Philip Berg, a Pennsylvania attorney, who at the time was tried by the Pennsylvania attorneys' bar and ultimately permanently disbarred.
13. Waddell called Taitz a "vampire parasite."
14. Waddell wrongfully claimed that a number of individuals convicted of crimes were employees of Taitz.
15. Waddell fabricated accusations against the husband of Taitz of creating a forged birth certificate that President Obama is using.
16. Waddell defames Taitz and her husband by stating "Taitz and her husband have malware and spyware (they create themselves) that they deposit on other computers to gather information that is sent back to their own servers. They like to crawl around inside other peoples computers and spy on private information."
17. I declare that all the above is true and correct to the best of my knowledge and informed belief

Jeff Lichter *Jeff Lichter*  
Address *4433 E. Wilshire*  
*Gilbert, Ariz. 85297*  
Phone *(480) 861-6903*

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of ORANGE

S.S.

Subscribed and sworn to (or affirmed) before me on this 17 day of Dec

2015, by Jeff Lichter and

he, proved to me on the basis of

satisfactory evidence to be the person(s) who appeared before me



12/12/2015

Liberi, et al v. Taitz, et al, U.S. District Court, Eastern District of PA, Case No. 09-cv-01035-LTS-JCL

lichterjeff@msn.com waddell

Gmail

Move to Inbox

Please find attached hereto Plaintiffs' Exhibit "1", the Affidavit of K. Stre...

Inbox (41,741)

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Important

Sent Mail

Drafts (1,139)

Circles

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Acquaintances (1...

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paypal and donations

doners

More

Philip Berg

Please find attached hereto the Affidavit of K. Strebel Exhibits "U"-"V" to P..

Jeff LICHTER <lichterjeff@msn.com>

to me

Date: Sat, 25 Sep 2010 10:41:36 -0700

From: shirleywaddell@atl.net

Subject: Fw: Fwd: Liber, et al v. Taitz, et al, U.S. District Court, Eastern Dis

To: lichterjeff@msn.com

4 Attachments

Date: 25 Sep 2010 10:41:36 -0700

From: shirleywaddell@atl.net

Subject: Fw: Fwd: Liber, et al v. Taitz, et al, U.S. District Court, Eastern Dis

To: lichterjeff@msn.com

Liberi, et al Oppo..

Waddell Affidavit .



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## **EXHIBIT 7**

### **FORGERY OF THE OFFICIAL COURT RECORD**

**14 PAGES OF DAMAGING CROSS EXAMINATION OF  
OSTELLA REMOVED**



- 
- 
- 

Fri, Jan 7, 2011 at 11:45 AM

Jan 7, 2011

from Donna Anders to you

**Liberi v. Taitz, et al**  
[Hide Details](#)

From

• Donna Anders To

• dr\_taitz@yahoo.com

• 1 Attachment

- 2.5MB
- [Save to](#)

PDF

R12-20-10C.pdf

2MB

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• Donna Anders To

• dr\_taitz@yahoo.com CC

• orly.taitz@gmail.com

• 1 Attachment

- 2.5MB
- [Save to](#)

PDF

R12-20-10C.pdf

2MB

[Save](#)

Dr. Taitz:

Attached is the transcript in PDF format. This is the third time I am sending this. Any questions, please don't hesitate to call me. The clerk's office will be sending the invoice and the hard copy of the transcript. There is a balance due. I may be contacted at 856-589-9005.

Donna

From: Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
Subject: Re: Liberi v. Taitz, et al  
To: "Dr. Orly Taitz ESQ" <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
Date: Sunday, January 9, 2011, 1:39 PM

Dr. Taitz:

Attached is the revised transcript. I myself will be out of the office Monday. You may call me any time after 12:00 and we can discuss the corrections. The scanning process was not working properly and those pages were omitted. I do apologize.

Donna

---

**From:** Dr. Orly Taitz ESQ <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
**To:** Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
**Sent:** Fri, January 7, 2011 7:01:12 PM  
**Subject:** Re: Liberi v. Taitz, et al

Donna

I received it on my yahoo account and I noticed several mistakes and typos that need to be corrected. Please, call me [949-683-5411](tel:949-683-5411), so I can advise you of the areas of errors. I will be in court on Monday until 11 PST. I will be at my office from 11 or 12 PST. Please call me to correct those errors

Dr. Orly Taitz ESQ  
29839 Santa Margarita Pkwy ste 100  
Rancho Santa Margarita Ca 92688  
ph. [949-683-5411](tel:949-683-5411)  
fax [949-766-7603](tel:949-766-7603)  
[orlytaitzesq.com](http://orlytaitzesq.com)  
[drtaitz.com](http://drtaitz.com)  
[taitzofficesuites.com](http://taitzofficesuites.com)

--- On **Fri, 1/7/11**, Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)> wrote:

From: Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
Subject: Liberi v. Taitz, et al  
To: [dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)  
Date: Friday, January 7, 2011, 11:45 AM







**R12-20-10C.pdf**

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Orly Taitz <orly.taitz@gmail.com>

1/9/11

to bcc: me, bcc: Neil, bcc: Ed, bcc: Lynda



**R12-20-10C.pdf**

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Dr. Orly Taitz ESQ <dr\_taitz@yahoo.com>

1/10/11

to

Dr. Orly Taitz ESQ  
29839 Santa Margarita Pkwy ste 100  
Rancho Santa Margarita Ca 92688  
ph. [949-683-5411](tel:949-683-5411)  
fax [949-766-7603](tel:949-766-7603)  
[orlytaitzesq.com](http://orlytaitzesq.com)  
[drtaitz.com](http://drtaitz.com)  
[taitzofficesuites.com](http://taitzofficesuites.com)

--- On Sun, 1/9/11, Dr. Orly Taitz ESQ <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)> wrote:

From: Dr. Orly Taitz ESQ <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>

Subject: Fw: Re: Liberi v. Taitz, et al

To: redacted

cc: "Orly Taitz" <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>, [orly.taitz@yahoo.com](mailto:orly.taitz@yahoo.com), [orly.taitz@gmail.com](mailto:orly.taitz@gmail.com)

Date: Sunday, January 9, 2011, 4:28 PM



**R12-20-10C.pdf**

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Dr. Orly Taitz ESQ <dr\_taitz@yahoo.com>

1/12/11

to Donna

Ms Anders,

I got a corrected transcript only after I raised this issue. I do not believe that one can miss the whole cross examination by error. You can miss a word or a sentence, but not a whole cross examination, not 14 pages.

Additionally, your original excuse of scanner malfunction made no sense, it looked like a cover up. Scanner does not malfunction from the middle of the page. I intend to go with this to proper authorities and demand investigation. There were multiple problems in this court with documents

not being docketed, removed from the docket. There are a number of serious concerns. I am asking you again, did you do, what you were told to do by someone? If so, by whom?

Please, don't try to threaten me with the "seize and desist" demands. I am simply providing the public with the information of what happened. Clearly you would state that it was not intentional. I believe it was intentional, as a number of other things that I observed in that court. I am within my right to demand investigation by different authorities. 2 certified copies of the same transcript with 14 pages difference warrant investigation. If this was done to me, it can be done to others. The public has a right to know, what is going on in courts.

Dr. Orly Taitz ESQ  
29839 Santa Margarita Pkwy ste 100  
Rancho Santa Margarita Ca 92688  
ph. [949-683-5411](tel:949-683-5411)  
fax [949-766-7603](tel:949-766-7603)  
[orlytaitzesq.com](http://orlytaitzesq.com)  
[drtaitz.com](http://drtaitz.com)  
[taitzofficesuites.com](http://taitzofficesuites.com)

--- On **Wed, 1/12/11**, Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)> wrote:

From: Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
Subject: Re: Liberi v. Taitz, et al  
To: "Dr. Orly Taitz ESQ" <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
Date: Wednesday, January 12, 2011, 1:39 PM

Dr. Taitz:

Attached is the response to this e-mail.

Donna

---

**From:** Dr. Orly Taitz ESQ <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
**To:** Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
**Sent:** Tue, January 11, 2011 3:07:51 PM

**Subject:** Re: Liberi v. Taitz, et al

there is a disciplinary hearing of the Supreme Court of PA scheduled against attorney Philip Berg. Originally you removed from the transcript the cross examination, that was detrimental to Berg.

You claimed that it was a problem with the scanner, but it is clearly not a scanner. There are multiple indications, that it is not a scanner.

I am filing a complaint about this matter. I just need to know, if this was your idea, than you are the only person responsible, or whether you were told by someone to do it , and you were just doing what you were told by someone?

Dr. Orly Taitz ESQ  
29839 Santa Margarita Pkwy ste 100  
Rancho Santa Margarita Ca 92688  
ph. [949-683-5411](tel:949-683-5411)  
fax [949-766-7603](tel:949-766-7603)  
[orlytaitzesq.com](http://orlytaitzesq.com)  
[drtaitz.com](http://drtaitz.com)  
[taitzofficesuites.com](http://taitzofficesuites.com)

--- On **Mon, 1/10/11**, Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)> wrote:

From: Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
Subject: Re: Liberi v. Taitz, et al  
To: "Dr. Orly Taitz ESQ" <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
Date: Monday, January 10, 2011, 5:04 PM

Dr. Taitz:

After reading your e-mail, I went back and checked what I had sent previously, and discovered I had sent you the transcript that was not proofread. Attached is the proofread PDF of the transcript. This is proofread back with the original disk taken in the courtroom. I hope you find this satisfactory. I will send an invoice in a separate invoice.

I do apologize.

Donna

---

**From:** Dr. Orly Taitz ESQ <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
**To:** Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
**Sent:** Mon, January 10, 2011 6:46:39 PM

**Subject:** Re: Liberi v. Taitz, et al

Donna  
there is still information missing. I remember specific questions and answers and those are not there. This is extremely troubling. I demand a full transcript ASAP



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA LIBERI, et al : CIVIL ACTION NO. 09-1898

v

ORLY TAITZ, a/k/a :  
DR. ORLY TAITZ; a/k/a :  
a/k/a WWW.REPUBX.COM, : Philadelphia, Pennsylvania  
a/k/a ORLY TAITZ, INC., : December 20, 2010  
et al, : 2:39 p.m.

TRANSCRIPT OF HEARING  
BEFORE THE HONORABLE EDUARDO C. ROBRENO  
UNITED STATES DISTRICT JUDGE

APPEARANCES:

For the Plaintiffs: PHILIP J. BERG, ESQUIRE  
Law Offices of  
Philip J. Berg  
555 Andorra Glen Court  
Suite 12  
Lafayette Hill, PA 19444

For Defendant Taitz: ORLY TAITZ, ESQUIRE  
Law Offices of Orly Taitz  
26302 La Paz  
Suite 211  
Mission Viejo, CA 92691

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Sewell, NJ 08080  
856-589-6100 • 856-589-9005

148

I N D E X

PLAINTIFFS' WITNESSES      DIRECT   CROSS   REDIRECT   RECROSS

Lisa Liberi

By Mr. Berg                      22

By Ms. Taitz                      55

Lisa Ostella

By Mr. Berg                      96

DEFENDANT'S WITNESS

DIRECT   CROSS   REDIRECT   RECROSS

Philip J. Berg

By Ms. Taitz                      125

\* \* \*

CERTIFICATION

I, Matthew Tilghman, do hereby certify that  
the foregoing is a true and correct transcript from the  
electronic sound recordings of the proceedings in the  
above-captioned matter.

Date

Matthew Tilghman



1 that.

2 (Recess, 5:12 p.m. to 5:20 p.m.)

3 THE COURT: Okay. Let's proceed. Mr. Berg,  
4 please take the stand, and would you swear Mr. Berg?

5 PHILIP BERG, Defendants' Witness, Sworn.

6 COURTROOM DEPUTY: Please state your name and  
7 spell your last name for the record, please.

8 THE WITNESS: Philip J. Berg, B-E-R-G.

9 THE COURT: Okay. Let's proceed, please.

10 DIRECT EXAMINATION

11 BY MS. TAITZ:

12 Q Mr. Berg, you have filed this lawsuit for liable  
13 and slander, is that correct?

14 A Among other things, yes.

15 Q In your pleadings, in your complaint, you stated  
16 that you have a staff of people working for you,  
17 office, that you are a highly respected attorney, a  
18 staff of people working for you, and Ms. Liberi is  
19 highly skilled legal assistant, is that correct?

20 A Yes.

21 Q Mr. Berg, how did you start working with Ms.  
22 Liberi?

23 MR. BERG: Your Honor, I'm going to object to  
24 this, not relevant to the proceeding before you.

25 THE COURT: Sustained.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA LIBERI, et al : CIVIL ACTION NO. 09-1898

v

ORLY TAITZ, a/k/a :  
DR. ORLY TAITZ; a/k/a :  
a/k/a WWW.REPUBX.COM, : Philadelphia, Pennsylvania  
a/k/a ORLY TAITZ, INC., : December 20, 2010  
et al, : 2:39 p.m.

TRANSCRIPT OF HEARING  
BEFORE THE HONORABLE EDUARDO C. ROBRENO  
UNITED STATES DISTRICT JUDGE

APPEARANCES:

For the Plaintiffs: PHILIP J. BERG, ESQUIRE  
Law Offices of  
Philip J. Berg  
555 Andorra Glen Court  
Suite 12  
Lafayette Hill, PA 19444

For Defendant Taitz: ORLY TAITZ, ESQUIRE  
Law Offices of Orly Taitz  
26302 La Paz  
Suite 211  
Mission Viejo, CA 92691

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17 Rickland Drive  
Sewell, NJ 08080  
856-589-6100 • 856-589-9005

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I N D E X

PLAINTIFFS' WITNESSES      DIRECT      CROSS      REDIRECT      RECROSS

Lisa Liberi

By Mr. Berg                      22

By Ms. Taitz                      55

Lisa Ostella

By Mr. Berg                      97

By Ms. Taitz                      120

DEFENDANTS' WITNESS      DIRECT      CROSS      REDIRECT      RECROSS

Philip J. Berg

By Ms. Taitz                      139

\* \* \*

CERTIFICATION

I, Matthew Tilghman, do hereby certify that  
the foregoing is a true and correct transcript from the  
electronic sound recordings of the proceedings in the  
above-captioned matter.

Date

Matthew Tilghman  
Matthew Tilghman



Ms. Ostella - Direct

121

1 A No, no.

2 Q That's not. But other documentation still is, is  
3 that correct?

4 A Yes.

5 MR. BERG: Cross-examine. Or I'm sorry, Your  
6 Honor.

7 THE COURT: Okay. Cross-examination.

8 (Pause in proceedings.)

9 CROSS-EXAMINATION

10 BY MS. TAITZ:

11 Q Ms. Ostella, isn't it true, and you stated this,  
12 that you were administrator -- you were the  
13 administrator for the website, Defend Our Freedoms  
14 Foundation, and you locked me out of that website, yes  
15 or no?

16 A defendourfreedoms.com, .org, .us, yes, I was web  
17 administrator.

18 Q You --

19 A And I --

20 Q And you locked --

21 A -- did lock you out.

22 Q Okay. You locked me out?

23 A Yes.

24 Q After you locked me out isn't it true that you  
25 continued sending e-mails to donors soliciting

Ms. Ostella - Cross

122

1 donations?

2 A No.

3 Q Ma'am --

4 A Can I see one of those e-mails?

5 MS. TAITZ: Your Honor --

6 THE COURT: Excuse me, that -- the answer is  
7 no.

8 THE WITNESS: I'm sorry, no.

9 THE COURT: Okay. Next question.

10 MS. TAITZ: Your Honor, I believed that this  
11 is hearing only about TRO. I do not have those e-mails  
12 right now, however, I will testify, and I am testifying  
13 under penalty of perjury, that numerous donors have  
14 received e-mails from Ms. Ostella asking for donations.

15 THE COURT: Well, as I said to you, this is a  
16 preliminary hearing.

17 MS. TAITZ: Yeah.

18 THE COURT: There may be -- there may be a  
19 need for further hearings and further evidence --

20 THE WITNESS: You have my --

21 THE COURT: -- so your --

22 THE WITNESS: You have a copy of my PayPal --

23 THE COURT: Excuse me a minute.

24 THE WITNESS: -- accounts with the material.

25 THE COURT: Please.

Ms. Ostella - Cross

123

1 THE WITNESS: I'm sorry.

2 (Pause in proceedings.)

3 THE COURT: You will have an opportunity --

4 MS. TAITZ: Okay.

5 THE COURT: -- if there is a further hearing.

6 MS. TAITZ: Yes.

7 THE COURT: As I said, there are other issues  
8 involved here, damages, professional conduct, a number  
9 of other issues that may require further explanation.

10 MS. TAITZ: Okay.

11 THE COURT: At this point your answer is no,  
12 and then --

13 MS. TAITZ: Okay.

14 THE COURT: -- you can ask the next question.

15 BY MS. TAITZ:

16 Q Ms. Ostella, after you locked me out I had to  
17 create a new website, and I created website  
18 orlytaitzesq.com, is that correct?

19 A No, you went to repubix next --

20 Q And then -- and then I created --

21 A -- and then orlytaitzesq.com, correct.

22 Q Okay. So I created my own website?

23 A Correct.

24 Q And my PayPal was connected to orlytaitzesq.com,  
25 that's right?

Ms. Ostella - Cross

124

1 A I -- yeah. I -- yeah.

2 Q So the PayPal that was connected to the old account  
3 was your account, right? Yes or no?

4 A You are talking about a virtual -- a virtual  
5 terminal versus a PayPal button so there is a  
6 differentiation between how you're saying that.

7 Q But it was -- okay. It was a PayPal account where  
8 people could donate, right?

9 A Correct.

10 Q So after you locked me out, you replaced my PayPal  
11 account with your own PayPal account on --

12 A Yes.

13 Q -- that website?

14 A Yes.

15 Q So when people, my donors, went on my old website,  
16 Defend Our Freedoms, instead of donating to me so I can  
17 work they were donating to you, right?

18 A Actually, I have my PayPal accounts in with the  
19 papers I gave you, and it shows no donations to --

20 Q But --

21 A -- Defend Our Freedoms.

22 Q And we will verify how much you received and how  
23 much you didn't receive.

24 But after you locked me out you replaced the  
25 account, so after I was locked out anybody who were to



Ms. Ostella - Cross

125

1 donate or not to donate would go to your personal  
2 account, is that correct?

3 A Would.

4 Q Yes. Okay. Now, let me ask you --

5 THE COURT: But you're saying no one did?

6 THE WITNESS: No one did and my PayPal  
7 records are in the book, sir.

8 MS. TAITZ: Your Honor, I actually do have  
9 records showing that indeed --

10 THE COURT: Okay, fine.

11 MS. TAITZ: -- that happened.

12 THE WITNESS: It would still be in my PayPal  
13 account.

14 BY MS. TAITZ:

15 Q Now, I will have to subpoena your PayPal account.

16 A Go ahead.

17 Q I have this from the donors. Now, isn't it true  
18 that in regards to this website, lisaliberi.com, and  
19 you stated before that the only connection that you  
20 have is with Mr. Staples, not with me?

21 A Correct.

22 Q Okay.

23 A And that's all I've said --

24 Q Okay.

25 A -- in my affidavits.

Ms. Ostella - Cross

126

1 Q Okay. So you are the expert for Berg and Liberi  
2 and you are saying that the subject of this TRO,  
3 lisaliberi.com, is only connected to Mr. Staples and  
4 not to me, is that correct?

5 A No, I didn't differentiate that. I said I have  
6 proof of Jeff Staples --

7 Q Okay. Only --

8 A -- not proof of you.

9 Q That's right. Okay. I wanted to ask just one more  
10 question. Through Mr. Berg you have submitted to Third  
11 Circuit Court of Appeals and court in Florida --

12 A Yes.

13 Q -- a statement that I allowed you to sign  
14 documents, is that correct?

15 A And I backed that up, too, with my material I  
16 submitted to that court.

17 Q Okay.

18 MS. TAITZ: Your Honor, I wanted to show you  
19 the documents that were submitted to Third Circuit  
20 Court of Appeals and a court in Florida that they  
21 submitted, if I can --

22 THE WITNESS: That doesn't look like the  
23 Pacer docket.

24 MR. BERG: Do you have a copy that I can see?

25 MS. TAITZ: Sure.

Ms. Ostella - Cross

127

1 THE COURT: Well, let's see. What do you  
2 purport this to be?

3 MS. TAITZ: This is forgery. I never --

4 THE COURT: No, but what is -- where does it  
5 come from?

6 MS. TAITZ: It says from Lisa Ostella. They  
7 have provided this to me and Mr. Berg.

8 THE COURT: You're saying these documents  
9 have been filed with a court?

10 MS. TAITZ: Yes.

11 THE WITNESS: Yes, but that is not the  
12 Pacer --

13 THE COURT: And they --

14 THE WITNESS: -- docket.

15 THE COURT: And they purport to have your  
16 signature?

17 MS. TAITZ: Ms. Ostella claimed that I  
18 allowed her to sign documents.

19 THE COURT: Okay.

20 MS. TAITZ: If you were to look at this -- if  
21 somebody allows you to sign documents, you would see  
22 that it's signed a little bit differently one time,  
23 another time.

24 And if you look at those documents, it's  
25 clearly a forgery. You can see that they took my

Ms. Ostella - Cross

128

1 signature from a document and cut and pasted it on  
2 multiple documents.

3 THE WITNESS: Yes, I did with her permission.

4 BY MS. TAITZ:

5 Q Okay. So you are saying that I permitted you to --  
6 to cut my signature from a document and paste it on  
7 many documents?

8 A I --

9 Q Is that what you're saying?

10 A And I did that on more than subpoenas. I did that  
11 on dossiers and letters you sent out too. I live in  
12 New Jersey, you live in California. We're not in the  
13 same office. I had permission to sign documents to  
14 you. I sent them out to the servers to sub --

15 Q Ma'am --

16 A -- for the subpoenas to be served.

17 Q Ma'am, if you can look at this document, you can  
18 see that the signature -- what -- it's the same  
19 signature on a number of documents.

20 A Yes.

21 Q Can you -- how -- can you explain how could it  
22 happen that if I were to allow it to you, how did it  
23 happen that on a document that you claim that I've  
24 allowed you to sign, cut and paste, in January there  
25 was a signature that was from April, three months



Ms. Ostella - Cross

129

1 later? How could that happen?

2 A I --

3 Q You took --

4 A -- don't understand.

5 Q You took a document that I signed in April of 2009  
6 and then you cut and pasted signature --

7 A That's the same --

8 Q -- on documents that were sent --

9 A That's the same signature.

10 Q -- several months earlier.

11 A I had your signature in a bit map on my computer.

12 Q Ma'am, every person signs documents a little bit  
13 differently.

14 A Not when you use a rubber stamp.

15 Q Do I have a rubber stamp?

16 A No, I had a bit map for your rubber stamp.

17 Q So you have -- you have created a rubber stamp with  
18 my signature?

19 A No, I had a bit map for your rubber stamp.

20 Q Okay. So you -- okay.

21 THE COURT: Okay. So next -- next area. Do  
22 you have anything else, Ms. Taitz?

23 MS. TAITZ: Okay, yes.

24 BY MS. TAITZ:

25 Q Ma'am, have you -- you have accused me of -- of

Ms. Ostella - Cross

130

1 stalking you and you have accused me -- I mean I am an  
2 attorney and you have accused me of trying to hire a  
3 hitman to kidnap your children.

4 A I did not make those statements.

5 Q Who made those statements?

6 A Those weren't made by me.

7 Q But can you tell me who made those statements?  
8 Where --

9 A They are in the court filings on this.

10 Q And who made those --

11 A I don't know who writes what.

12 Q And who made those court filings?

13 A They came from my attorney's law office.

14 Q You mean they came from Mr. Berg, right?

15 A His law office, yes.

16 Q And how did he come up with this idea that I tried  
17 to hire somebody to kidnap your children? Can you  
18 explain?

19 A Oh, that?

20 Q Yes.

21 A That wasn't hitman. That was different. Are you  
22 talking about -- okay. Because if you're talking about  
23 the kidnapping of my children, that was --

24 Q Yes.

25 A -- different from Ruben Nierto.

Ms. Ostella - Cross

131

1 Q Okay. How -- I mean you -- you have accused me of  
2 serious crimes.

3 A Yes, I have.

4 Q And on what basis?

5 A And I stand on them.

6 Q Okay. What's the basis?

7 A You came to New Jersey after the last court date  
8 and drove around New Jersey, drove past my child's  
9 school, drove past my house.

10 Q Ma'am --

11 A I --

12 Q Ma'am, excuse me. Where -- from what -- where do  
13 you get it? You -- there is -- there is -- I -- there  
14 is no evidence to that. I would --

15 A Yes, there is.

16 Q I went to New Jersey to report you, report the fact  
17 that you locked me out of the account of my foundation  
18 and you replaced my PayPal with your PayPal. I went to  
19 New Jersey to report diversionary funds from my  
20 foundation. Instead, you accuse me of going to New  
21 Jersey to kidnap your children. From what?

22 A No, I didn't accuse you of going to kidnap my  
23 children on that trip. I have an affidavit.

24 THE WITNESS: Tab K, sir, in the binder I  
25 gave you.

Ms. Ostella - Cross

132

1 THE COURT: To what effect?

2 THE WITNESS: Tab K is the gentleman that was  
3 with her when she drove around New Jersey.

4 MS. TAITZ: He is not here. This is -- he is  
5 the --

6 THE WITNESS: His affidavit is here.

7 MS. TAITZ: But this is hearsay. I cannot  
8 question him.

9 THE WITNESS: Affidavits are not hearsay.

10 BY MS. TAITZ:

11 Q Does it say anywhere in his affidavit that I was  
12 trying to kidnap your children?

13 A No, I didn't say it was.

14 Q Does it say that I went to report you to the  
15 police, yes or no?

16 A Yes, you came --

17 Q Okay. Thank you.

18 A -- here, drove past --

19 Q No more --

20 A -- my house.

21 MS. TAITZ: That is all.

22 THE WITNESS: No, she's cutting off my  
23 statement.

24 THE COURT: Okay. Thank you. You may step  
25 down, ma'am. Okay.

## **EXHIBIT 8**

**AUGUST 27, 2017, BERG PROMOTING  
"OBAMASCARE" BOOK**

**WHERE A FULL CHAPTER IS DEVOTED TO VICIOUS  
DEFAMATION OF TAITZ**





Check mail

Compose

Search this folder

Search

Inbox

0/358

Sent

Drafts

19

Junk

300

Trash

726

Manage folders

[Back to Inbox](#) [Reply](#) [Reply all](#) [Forward](#) [Mark unread](#) [Move](#) [Delete](#) [Report spam](#) [Previous](#) 13 of 19392 [Next](#)

## Re: I have BCC'd a myriad of Constitutionalists (aka Birthers)

Philip Berg to Gary W., Sharon Rondeau, Andrea Shee King, Arien Williams, Betina Viviano, Bob Nelson, Brian Wilmott, Burgess Owens, Carl Gailup, Carl Swensson, Charles Kerchner, Cort Wrotowski, Dale Laudenslager, David LaRocque, Diana West, Don Frederick, Dr. Kate Vandemoer, Ed Sunderland, Edward C. Noonan, Erik Rush, Floyd Brown, Gary Laconis, Gary Laconis, George Miller, Harry Accornero, Harry Wilmott, JB Williams, Jack Cashill, Jeff Harrison, Jeff LICHTER, Jerome Corsi, Joan Swirsky, Karen Kiefer, Kevin Powell, LL Wilkinson, Ladysforest, Larry Conti, Laurie Roth, Lawrence Sellin, Linda Bentley, Lloyd Marcus, Mara Zebest, Marco Ciavolino, Mario Apuzzo, Mark Gillar, Michael Volin, Mike Lerman, Neil Sankey, Neil Turner, Neil Turner, Nellie Ristvedt, Orly Taitz, Pamela Barnett, Pat Boone, Paul Irey, Peter Boyles, Randy Foreman, Rob Lamb, Robert Rosenberg, Roger Ogden, Steve Yantzer, TPATH, Terry Lakin, Tom Ballantyne, Tony Dolz, Voni McGrath (6 hours ago) [show details](#) [create a rule](#)

I agree !

A good start would be to promote my book, ObamaScare, as it details Obama as a Fraud, Phony, Liar & Imposter ! Obama was Born in Kenya and always was Constitutionally INeligible to be president. It also details 40 of Obama's wrongs including Benghazi, IRS, AP, etc.

On Sun, Aug 27, 2017 at 8:12 PM Gary W <gmw0411@att.net> wrote:

Thought: Can we leverage Sheriff Joe and his presidential pardon to bring attention and a favorable resolution to Terry Lakin's situation?

Enough is enough. I am sick and tired of the despicable media and self-serving frauds in Congress who refuse to report the truth or do the RIGHT thing! The media and most people in Congress are our enemy!

If we want to make America great again we first need to take back our country!

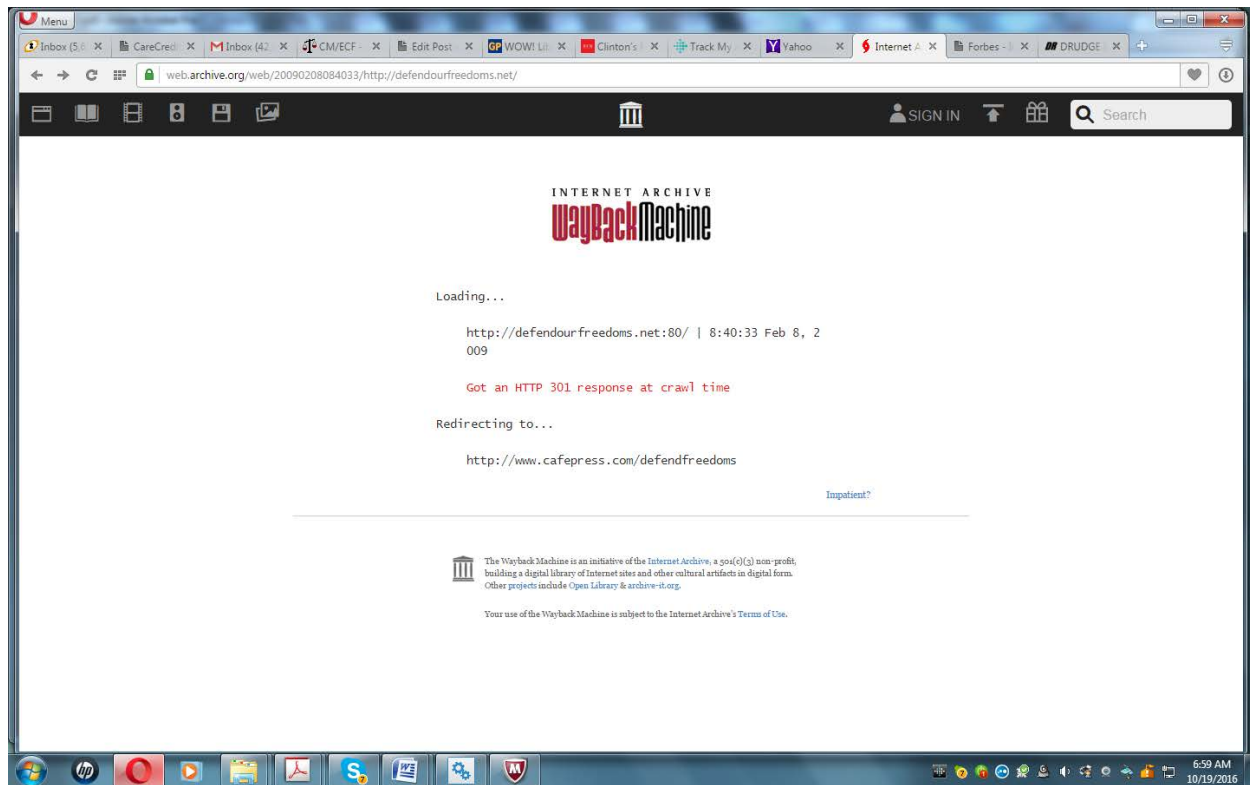
Obama and his thugs and the evil media need to FINALLY be

[Back to Inbox](#) [Reply](#) [Reply all](#) [Forward](#) [Mark unread](#) [Move](#) [Delete](#) [Report spam](#) [Previous](#) 13 of 19392 [Next](#)
View as: [Mobile](#) | Desktop

## **EXHIBIT 9**

**Ostella using defendourfreedoms.net for  
cafePress.com link to sell t-shirts.**

**No accounting and no money was transferred to DOFF  
by Ostella**



## **EXHIBIT 10**

### **THEFT OF SOCIAL SECURITY NUMBER OF TAITZ**



FRESNO CA 93888-0025

In reply refer to:  
Feb. 05, 2014 LTR

ORLY TAITZ



004908

Taxpayer Identification Number:  
Tax Period(s):

Form: 1040

Dear Taxpayer:

We regret that we sent you an incorrect refund for mail. The refund, dated Apr. 16, 2012, was for the Dec. 31, 2011, tax period. We sent this refund to you in error because there was an issue of identity theft on your account.

To correct the refund check, we have withdrawn the refund amount from



## **EXHIBIT 11**

**Examples of e-mails from donors stating that their donations were diverted from DOFF. Lisa Ostella writing to donor an explanation for the problem and not blaming it on a computer glitch, but rather blaming another person, a moderator on the web site, for changing the e-mail address, which led to diversion of donations**

3/17/2017 (79260 unread) dr\_taitz@yahoo.com Yahoo Mail

Dr. Orly Taitz ESQ, search your mailbox

Home Orly

Compose

Search results

Archive Move Delete Spam More

Home Orly

Add Gmail, Outlook, AOL and more

Inbox (9999+)

Drafts (20)

Sent

Archive

Spam (2309)

Trash (50)

Smart Views

Important

Unread

Starred

People

Social

Shopping

Travel

Finance

suntrust

Folders (1)

Recent

Fw: RE: Donation to DOFF February 25, 2009

Kathleen V [REDACTED] 03/28/09 at 5:38 PM

To: dr\_taitz@yahoo.com

Dear Orly,

I wrote to Lisa Ostella and this was her answer to me about the paypal donation of 100.00 on February 25. I will try to get money to you, but am still trying to find out what happened to the original 100.00 I sent. If you haven't received it and it wasn't returned to me, where is it? I still wonder what's going on and I will try to solve it. Is Lisa Ostella one of your people? Kathleen

--- On Sat, 3/28/09, Lisa Ostella <lisaostella@hotmail.com> wrote:

From: Lisa Ostella <lisaostella@hotmail.com>  
Subject: RE: Donation to DOFF February 25, 2009  
To: kathleenv [REDACTED]  
Date: Saturday, March 28, 2009, 10:29 AM

A moderator from the site board, who no longer works with us, changed Orly's email to: gmail.org

This has been resolved.

Her PayPal email is [orly.taitz@gmail.com](mailto:orly.taitz@gmail.com)

Now, below, you said the money was charged back and you also said you haven't received it. I don't understand.

Our methods we have is snail mail and PayPal. Sorry if you aren't comfortable with that.

Lisa Ostella  
Defend Our Freedoms Foundation  
<http://defendourfreedom.org>  
Peace through Strength  
<http://www.barointegrity.com>

Date: Sat, 28 Mar 2009 07:13:41 -0700  
From: kathleenv [REDACTED]  
Subject: Donation to DOFF February 25, 2009  
To: lisaostella@hotmail.com

Hello Lisa,

I sent a 100.00 donation to Orly through my paypal account on February 25. The money was charged to my credit card within the next few days. Yesterday, I got a letter from pp saying that Orly did not sign up for her recipient account @gmail.com and the transaction could not be completed. This makes no sense, and furthermore, doesn't explain why they held onto the money for more than a month. The money has not been credited back to me yet.

Just to let you know, I intend to cancel my paypal account now. To be honest, I do not think that sending a hard check or a cashier's check to Mrs. Taitz' address is safe. What do you recommend?

Kathleen V [REDACTED]

Quick access to Windows Live and your favorite MSN content with [Internet Explorer 8](#).

A comment regarding "Breaking and entering into my PayPal account", an entry at [DEFENDOURFREEDOMS.US](http://DEFENDOURFREEDOMS.US), was written at 3/9/2009 2:24:45 PM.

Author: Pat

IP Address: [REDACTED]

Email Address: [REDACTED]

Home Page:

Comment:

Hi!

I wrote to you many weeks back as we tried on several occasions to send money via Paypal to you but we did not hear back from anyone. We reported the problems we were having trying to send donations and when we did not hear back we could only assume that you were not interested.

We wanted to do something to help and also offered to send letters out to elected officials as well in order to help with the costs of printing...still no reply.

We know there was no problem on our end as we donate to many causes via Paypal and had no problems, so we wanted to alert you to the problem.

I would strongly recommended a P.O. box. Next thing you know someone will be stealing your mail. At least at a PO box they is under lock and you would be the only one with a key.

Thanks



A comment regarding "Breaking and entering into my PayPal account", an entry at [DEFENDOURFREEDOMS.US](http://DEFENDOURFREEDOMS.US), was written at 3/9/2009 9:56:37 AM.

---

Author: Martin SC

IP Address: [REDACTED]

Email Address: [REDACTED]

Home Page:

---

Comment:

I just checked Pay-Pal & a donation that I sent through on 3-6-09 was diverted to the (Hacked Address) see below. Under "Status".... is said "Unclaimed", so I cancelled it. If donations have been claimed.... does it count the same as "Snail Mail" fraud which is a Felony offence?

Get 'em Dr. Orly !!! Can you believe the nerve of someone who would mess with the relentlessness of Dr. Taitz..... Jail time pending if those donations show up as "Claimed".... Add this mess the the "Eric Holder Letter... for the special Prosecutor to deal with.

From Pay-Pal website:

Do you want to cancel this payment?

Payment Type: Donation Sent

Transaction ID: 9WF64738J72645149

Email: [orly.taitz@gmail.org](mailto:orly.taitz@gmail.org)

Date: Mar. 6, 2009

Time: 14:58:32 PST

Status: Canceled

Amount: -\$25.00 USD

---

You can perform the following actions on this comment:

- [Approve](#) this comment.
- [Reply](#) to this comment.

This is an automated message.

A comment regarding "Breaking and entering into my PayPal account", an entry at [DEFENDOURFREEDOMS.US](http://DEFENDOURFREEDOMS.US), was written at 3/15/2009 9:41:43 AM.

Author: Monica C.

IP Address: [REDACTED]

Email Address: [REDACTED]

Home Page:

Comment:

ok. i'm concerned now... i've just gone back over my paypal account online, and my receipt, and it appears my contribution may have gone elsewhere as well:

Business Name:

Defend Our Freedoms (The recipient of this payment is Verified)

Email:

[lisaostella@hotmail.com](mailto:lisaostella@hotmail.com)

i attempted to contact paypal regarding this, and was unable to online, via the website or via email. i'm going to call them. they should have to take some responsibility based on the fact that they stated the recipient was verified for "defend our freedoms." (perhaps i'm just too trusting...) so what can we do? or are we just out the donation?

You can perform the following actions on this comment:

- [Approve](#) this comment.
- [Reply](#) to this comment.

This is an automated message.